



California Office
 2001 Center Street, 4th Floor
 Berkeley, CA 94704-1204
 Tel: (510) 665-8644
 Fax: (510) 665-8511
www.dralegal.org

New York Office
 655 Third Avenue, 14th Floor
 New York, NY 10017-5621
 Tel: (212) 644-8644
 Fax: (212) 644-8636
www.dralegal.org

April 9, 2020

Via ECF

Honorable Valerie E. Caproni
 United States District Judge
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: *Disabled In Action, et al. v. The City of New York, et al.*, No. 16-cv-8354 (VEC)

Dear Judge Caproni:

The parties write jointly pursuant to the Court's Order of February 4, 2020, granting Plaintiffs' Motion for Partial Summary Judgment and directing the parties to meet and confer in good faith and submit a joint letter describing our efforts to reach a solution on remedy and proposing next steps.

The parties spoke over the phone on February 27 to begin the process directed by the Court. On February 27, Plaintiffs provided a proposal of settlement terms, and Defendants provided a counter-proposal on March 6. The parties have exchanged emails thereafter to discuss the proposals. The parties have not been able to reach agreement regarding the process, timeframe, and framework for remediation. Therefore, we jointly request a referral to the magistrate judge for a settlement conference to bridge the gaps between the parties' proposals. We are hopeful that with the assistance of a neutral third party, we will be able to proceed expeditiously toward settlement.

Respectfully,

A handwritten signature in black ink that reads 'Rebecca Rodgers'.

Rebecca Rodgers
 Senior Staff Attorney
 Disability Rights Advocates

/s/ Carolyn Kruk
 Carolyn Kruk
 Senior Counsel
 New York City Law Department